

June 15, 2010

## Supporting Statement for Paperwork Reduction Act Submissions

**OMB Control Number: 1660 - NEW**

**Title: Homeland Security Exercise and Evaluation Program (HSEEP)  
After Action Report (AAR) Improvement Plan (IP)**

**Form Number(s): 091-0**

### General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked "Yes", Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

### Specific Instructions

#### A. Justification

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.**

Homeland Security Presidential Directive-8 (HSPD-8) establishes policies to strengthen the preparedness of the United States to prevent and respond to domestic terrorist threats and attacks, major disasters, and other emergencies by requiring a national domestic all-hazards preparedness goal, establishing mechanisms for improved delivery of Federal preparedness assistance to State, tribal and local governments, and outlining actions to strengthen preparedness capabilities of Federal, State, tribal and local entities.

HSPD-8 directs that DHS, in coordination with other appropriate Federal departments and agencies, establish a "national program and a multi-year planning system to conduct homeland security preparedness-related exercises that reinforces identified training standards, provides for evaluation of readiness, and supports the National

Preparedness Goal.” HSEEP provides the program doctrine and methodology, multi-year planning system, tools, and guidance necessary for entities to build and sustain exercise programs that enhance homeland security capabilities and, ultimately, National preparedness. Section 648(b)(1) of the Post-Katrina Emergency Management Reform Act of 2006 (6 U.S.C. §748(b)(1)) also provides for these exercises, and states the Administrator “shall carry out a national exercise program to test and evaluate the national preparedness goal, National Incident Management System, National Response Plan, and other related plans and strategies.”

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.**

**Homeland Security Exercise and Evaluation Program (HSEEP) After Action Report (AAR)/Improvement Plan (IP)** – Improvement planning is the process by which the observations and recommendations recorded in the draft After Action Report (AAR) are resolved through development of concrete corrective actions that are prioritized, tracked, and analyzed by program managers as part of a continuous Corrective Action Program (CAP). The information contained within this report identifies areas where expectations for preparedness to respond to an emergency situation are met as well as areas where improvement is required. This information is made available to the Domestic Readiness Group’s sub-Interagency Policy Committee, the National Exercise Program Executive Steering Committee, and other senior leaders as appropriate for planning and corrective actions in order to improve capabilities, eliminate capability gaps and increase levels of preparedness for applicable Federal, State, tribal and local entities.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The HSEEP AAR IP tool can be downloaded from the HSEEP library on the HSEEP website at [https://hseep.dhs.gov/support/AAR-IP\\_Template%202007.doc](https://hseep.dhs.gov/support/AAR-IP_Template%202007.doc) in a Word document. The report is electronically completed and sent as an attachment via e-mail, or is directly mailed to FEMA in hardcopy format.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The AAR/IP form exists as the single report for an exercise's capability performance, participant feedback, and improvement planning. This information is not collected in any other form, and therefore is not duplicated elsewhere.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.**

This information collection does not have an impact on small businesses or other small entities.

**6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.**

The Homeland Security Exercise and Evaluation Program (HSEEP) After Action Report (AAR) Improvement Plan (IP) provides a standardized methodology and terminology for reporting on the results of preparedness exercises and provides assessments of the respondent's capabilities so that strengths and areas for improvement are identified, corrected, and shared as appropriate in order to improve National preparedness for all hazards. Without this information, such details would not be available for review, and the planning for real world events would be compromised. Taking exercises as a proxy for real-world situations and providing the results in this report, the prevent, protect, respond, and recover capability elements performed in an exercise give us the best indicators for actual capabilities a jurisdiction would have to address a real-world natural disaster and/or terrorist event.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

**(a) Requiring respondents to report information to the agency more often than quarterly.**

There is no requirement to report information more often than quarterly.

**(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.**

There is no requirement for a written response in fewer than 30 days.

**(c) Requiring respondents to submit more than an original and two copies of any document.**

There is no requirement to submit more than an original and two copies of documents.

- (d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.**

There is no requirement to retain records for more than three years.

- (e) In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study.**

This collection does not employ statistical methodology.

- (f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.**

The information collection will not use any statistical data classification.

- (g) That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use.**

There is no pledge of confidentiality that is not supported by authority.

- (h) Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There is no requirement for respondents to submit proprietary trade secrets or other confidential information.

## **8. Federal Register Notice:**

- a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

A 60-day Federal Register Notice inviting public comments was published on March 23, 2010, Volume 75 pp 13775. No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on July 1, 2010, Volume 75 pp 38114. No comments were received. See attached copy of the published notice included in this package.

**b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

Consultations with other Federal Agencies, the National Council on Disability, and the National Advisory Council occur annually regarding the development, testing and evaluation of the national preparedness goal and other plans and strategies. Several HSEEP working groups have been held with exercise and emergency management stakeholders across the Nation in order to provide recommendations for further development and revision of exercise evaluation and after-action reporting policy.

**c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records. Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

Comments from representatives from whom the information is collected from are welcomed. A formal process for this to occur is the inclusion of the “Participant Feedback Summary” section within the report that allows the respondents to offer suggestions, critiques of exercise actions and other feedback. FEMA uses this information to better prepare for future exercises.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

**10. Describe any assurance of confidentiality provided to respondents. Present the basis for the assurance in statute, regulation, or agency policy.**

There are no assurances of confidentiality provided to the respondents for this information collection. A Privacy Impact Assessment is currently under review by the FEMA Privacy Office.

**11. Provide additional justification for any question of a sensitive nature (such as sexual behavior and attitudes, religious beliefs and other matters that are commonly considered private). This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information,**

**the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

**a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

It is estimated that 56 State Business and Financial Representatives will respond to this collection 5 times a year and each response will average 160 hours to complete. The total Annual Hour Burden for this collection is  $56 \times 5 \times 160$  hours = 44,800 hours.

**b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

**c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.**

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate*	Total Annual Respondent Cost
State, Local or Tribal Government; Federal Government	HSEEP/AAR/IP / FEMA Form 091-0	56	5	280	160	44,800	\$36.15	\$1,619,520

Total	56	280	44,800	\$1,619,520
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- Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.

According to the U.S. Department of Labor, Bureau of Labor Statistics Website ([www.bls.gov](http://www.bls.gov)) the wage rate category for State Business and Financial Representatives is estimated to be \$25.82 per hour, applying the 1.4 multiplier produces a fully loaded wage of \$36.15. The estimated total burden hour cost is estimated to \$1,619,520 annually.

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

The cost estimates should be split into two components:

- Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.**
- Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.**

**Annual Cost Burden to Respondents or Record-keepers**

<b>Data Collection Activity/Instrument</b>	<b>*Annual Capital Start-Up Cost</b> (investments in overhead, equipment and other one-time expenditures)	<b>*Annual Operations and Maintenance Cost</b> (such as recordkeeping, technical/professional services, ect.)	<b>Annual Non-Labor Cost</b> (expenditures on training, travel and other resources)	<b>Total Annual Cost to Respondents</b>
	0	0	0	0
<b>Total</b>				

There are no operation and maintenance, capital and start-up-cost to respondents for this collection of information.

**14. Provide estimates of annualized cost to the federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing and support**

staff), and any other expense that would have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

**Annual Cost to the Federal Government**

Item	Cost (\$)
Contract Costs \$35,000,000 with 5% allocated to reviewing the After Action Reports, performing follow-up work as required and collating data. $\$35,000,000 \times 5\% = \$1,750,000$	\$1,750,000
Staff Salaries* [ 5 of GS 13 , step1 employees spending approximately 5% of time annually reviewing the data, making determinations of the outcomes, performing follow-up as necessary and assuring quality control of the process for this data collection] [5 x 89,033 x 5% = 22,258 x 1.4 = \$31,161]	\$31,161
Facilities [cost for renting, overhead, ect. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	
Printing [number of data collection instruments annually]	
Postage [annual number of data collection instruments x postage]	
Other	
<b>Total</b>	<b>\$1,781,161</b>

\* Note: The "Salary Rate" includes a 1.4 multiplier to reflect a fully-loaded wage rate.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.**

A "**Program increase**" is an additional burden resulting from an federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "**Program decrease**", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
HSEEP/AAR/IP / 091-0	0	115,200	+115,200			



Total(s)	0	115,200	+115,200		
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**Explain:** This is a new collection tool and has not previously had burden hours calculated for it.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
HSEEP/AAR/IP / 091-0	0	\$4,164,480	+\$4,164,480			
	0	\$4,164,480	+4,164,480			
Total(s)						

**Explain:** This is a new collection tool and has not previously had cost burden calculated for it.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

There are no outline plans for tabulation and publication of data for this information collection.

**17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.**

This collection does not seek approval to not display the expiration date for OMB approval.

**18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.**

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”.

**B. Collections of Information Employing Statistical Methods.**

**THERE IS NO STATISTICAL METHODOLOGY INVOLVED IN THIS COLLECTION.**